

Remy Green Timesheet
Rudler v. MLA Law, 19-cv-2170

Project/Time entry	Start date	Time		
<u>Pre-Fee Application Time</u>				
Follow up TC with clerk	11/05/2020	0.100		
TC with clerk re: EK's preferences on settlement	10/27/2020	0.100		
Draft cover letter and file signed settlement	10/27/2020	0.300		
Make changes agreed on w/ JM; email final copy	10/23/2020	0.400		
Settlement TC with JM	10/23/2020	0.500		
Emails with JMal.; draft response re: settlement	10/22/2020	0.600		
Draft Settlement	10/14/2020	1.300		
TC with JM	10/14/2020	0.300		
return JM call	10/13/2020	0.100		
TC with JM	10/06/2020	0.300		
Finalize and file class cert motion package	09/30/2020	0.600		
Draft and edit notice of motion; collect exhibits and print declarations	09/30/2020	0.500		
Final review of all documents; consistency/blanks; TOA/TOC, final edits	09/30/2020	1.400		
Draft/edit class cert memo (Att'n to merits/standards/application to facts)	09/29/2020	2.300		
Draft atty dec (class cert)	09/28/2020	1.000		
Research FDCPA and NYGBL interactions on class issues; on remedy issues	09/28/2020	1.800		
Edit class cert memo and declarations, check citations, and review authority	09/28/2020	1.900		
Draft declarations for class cert motion	09/27/2020	0.500		
Research on class cert. issues in FDCPA context	09/27/2020	1.500		
review JM WP and re-draft emails with JM	09/26/2020	2.500		
Prepare for and attend conference; follow up TC to attempt to settle.	09/18/2020	1.300		

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Re-read correspondence to prepare for JM's requested call	09/15/2020	0.400	
TC with JM	09/15/2020	0.700	
Review JM filing	08/31/2020	0.200	
Review Arleo filing	08/31/2020	0.200	
TC with Arleo re: confi; review proposed revised confi letter	08/31/2020	0.200	
Prepare formal letter confirming (already existing and written) informal agreement on confidentiality	08/29/2020	0.400	
TC with Arleo re: breakdown in A/C relationship/housekeeping on agreed obligations	08/28/2020	0.200	
Draft/research motion for waiver	08/27/2020	2.800	
Draft email to Arleo	08/27/2020	0.300	
TC with Arleo re: arleo withdrawal; confidentiality	08/27/2020	0.300	
TC with arleo	08/25/2020	0.200	
TC with Arleo; TC with JM w/ update	08/24/2020	0.400	
Review depo transcript	07/27/2020	0.600	
Order of Operations letter brief -- finalize and file	07/22/2020	0.800	
Final preparation for and attend/conduct JM's deposition	07/22/2020	5.200	
Prepare Deposition exhibits and outline	07/22/2020	0.900	
Prepare Deposition exhibits and outline	07/21/2020	2.500	
Draft and research order of operations letter brief	07/20/2020	2.900	
Deposition Preparation (research property ownership/corporate issues unaddressed by Arleo's rog responses, despite request)	07/14/2020	0.800	
prepare for and attend motion/housekeeping conference; follow up communications with Arleo	07/01/2020	1.000	
Final preparation for and attend P's deposition (inc. .2 start delay); debrief with client (.4)	06/30/2020	2.100	

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MLA prep for deposition	06/29/2020	1.500		
MLA prep for deposition	06/29/2020	0.100		
Respond to Arleo communications (incl. providing documents already provided multiple times, at Arleo's request)	06/25/2020	0.900		
TC with Arleo	06/23/2020	0.500		
Summary email from TC with RA (at RA's request)	06/17/2020	0.300		
TC with RA (meet and confer)	06/17/2020	0.700		
Review Defendants' third amended class discovery responses	03/12/2020	0.500		
respond to D's discovery refusals (and insults)	03/12/2020	0.300		
call with BR re: Def's discovery	03/03/2020	0.700		
revise RFA responses based on call with BR	03/03/2020	0.500		
TC with JM; TC with RA (.8)	03/02/2020	0.900		
TC with JM	03/02/2020	0.400		
TC with JM re: docket, R68 letter	02/28/2020	0.500		
TC with JM re: docket, R68 letter	02/28/2020	0.200		
Draft Letter Motion re: R68 Offer	02/28/2020	2.100		
TC with JM and with Client (.3)	02/27/2020	0.300		
TC with JM and with Client (.3)	02/27/2020	0.300		
TC with JM and with Client (.3)	02/27/2020	0.400		
Draft response to Amended Answer/Letter motion for stay	02/27/2020	1.400		
MLA letter re latest filings	02/26/2020	0.200		
research various issues raised by Defendants' stay letter	02/25/2020	1.000		
Draft response to OC	02/24/2020	0.400		
Draft letter re motion schedule	02/24/2020	0.700		
TC with JM re: planning/next steps	02/24/2020	0.500		
TC with JM re: planning/next steps	02/24/2020	0.300		
call with BB (NACA) re: Arleo conduct	02/23/2020	0.900		

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communicatin with new OC re; 68 offer and class issues	02/21/2020	0.400		
Draft motion to strike/toll/declare invalid R68 offer	02/21/2020	0.300		
Draft motion to strike/toll/declare invalid R68 offer	02/21/2020	0.700		
communicatin with new OC re; 68 offer and class issues	02/21/2020	0.400		
Call with Jess M (atty)	02/20/2020	0.200		
review R68/correspond with D's new atty	02/20/2020	0.400		
Call with [REDACTED] (para) (assigning class cert brief and papers)	02/19/2020	0.700		
communicatin with new OC (Arleo/RA)	02/19/2020	0.300		
Draft letter motion to compel (non responses on numerosity, letters)	02/18/2020	1.400		
Draft letter motion to compel (non responses on numerosity, letters)	02/18/2020	1.100		
Prelim Class Cert drafting	02/18/2020	2.300		
Respond to Def's position on class discovery	02/17/2020	0.800		
Draft letter to court re: SJ/Judgment on the pleadings	02/14/2020	2.500		
Call with RAC counsel re: subpoena	02/14/2020	0.200		
Draft letter to court re: SJ/Judgment on the pleadings	02/14/2020	0.500		
settlement discussions with Defs	02/13/2020	0.300		
Draft email to RAC's lawyers	02/04/2020	0.300		
Prep for M&C call (0.3); Attempt to call OC, begin to draft email re: failure to answer call (.2); attend M&C call (late)	02/04/2020	0.900		
TC with JM re: discovery	02/03/2020	0.200		
response to John Mal. asking me to find the citation to case the Court directed him to review (.3); prepare meet & confer letter re: Def's (non-)production	02/03/2020	1.600		
Review Def's "production," discuss responses with Jess M	02/03/2020	0.800		
Review notes from teleconference; re-read case cited by Court	01/29/2020	0.200		

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Draft Amended Complaint	01/29/2020	0.700		
Draft Amended Complaint	01/29/2020	0.400		
Attend Pre-motion Teleconference	01/29/2020	0.900		
prepare for conference	01/29/2020	0.600		
Call chambers; call/email OC	01/23/2020	0.200		
Research legal assertions in Def's settlement position (e.g., debt letter does not need exact number despite text of FDCPA; 7th Cir. has "approved" letter at issue (they have not -- see Miller))	01/17/2020	1.700		
Settlement Call	01/16/2020	0.400		
Travel to and attend in person premotion conference (including waiting b/c Court's schedule was overbooked)	01/15/2020	3.200		
Prepare for Pre-Motion Conference	01/14/2020	1.400		
Finalize Rule 26 disclosures	01/14/2020	0.400		
Prepare for Pre-Motion Conference	01/13/2020	0.400		
Prepare for Pre-Motion Conference	01/13/2020	0.300		
Magistrate jurisdiction research (cross-objection timing and appeal directly to circuit)	01/08/2020	0.300		
Call with RAC's attys (.3); Research and provide response to RAC attys	01/06/2020	0.800		
Draft D&I for class	12/31/2019	1.000		
calls/emails with Defs' counsel, attempt to accomodate whatever objections counsel had to P's statement of position; TC with JM re adjournment	12/20/2019	3.500		
call with Def's Counsel	12/19/2019	0.100		
respond to Def's Counsel	12/18/2019	0.200		
Discussion with Jess M. re: responses to Def's counsel	12/18/2019	0.400		
Draft third party deposition/research third party discovery issues	12/09/2019	0.300		

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Draft third party deposition/research third party discovery issues		12/09/2019	0.700	
Draft and research MSJ/Strike materials		12/06/2019	4.100	
letter discussion with JM		12/03/2019	0.400	
Draft Pre-Motion Conference Opp (Defs' motion to dismiss)		12/02/2019	1.100	
Prepare Rule 26 Materials		12/02/2019	0.800	
Prepare Rule 26 Materials		12/01/2019	1.800	
MLA Draft Email to OC regarding outstanding non-settlement issues		11/29/2019	1.000	
settlement call with JM		11/27/2019	0.300	
Prepare Rule 26 Materials		11/27/2019	0.200	
wait for OC's call scheduled for 12:00 (until email at 12:30)		11/26/2019	0.600	
Attempt to schedule and comm'n with OC re: Rule 26/settlement		11/26/2019	0.300	
Prepare Rule 26 Materials		11/26/2019	0.400	
Prepare Rule 26 Materials		11/22/2019	0.300	
conference call		11/20/2019	0.600	Reduce .6 - VAGUE
Prepare and research opp to vacate		11/15/2019	1.000	
Prepare and research opp to vacate		11/14/2019	1.800	
Prepare and research opp to vacate		11/13/2019	0.900	
Prepare and research opp to vacate		11/13/2019	0.600	
Prepare and research opp to vacate		11/13/2019	0.300	
Prepare and research opp to vacate		11/13/2019	0.800	
Prepare and research opp to vacate		11/13/2019	1.800	
Prepare and research opp to vacate		11/12/2019	1.500	
Prepare opp to Good Cause		11/06/2019	0.300	
Prepare opp to Good Cause		11/06/2019	0.600	
Prepare opp to Good Cause		11/06/2019	0.400	

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PHV motion response	10/30/2019	0.400		
PHV motion response and research	10/29/2019	2.500		
Subpoena follow up	10/28/2019	0.800		
Draft Class RTAs	10/18/2019	1.100		
Review Def'ts letter threatening sanctions, research issues raised	10/18/2019	1.500		
Discuss subpoena with process server	10/16/2019	0.200		
Discuss subpoena with process server	10/14/2019	0.300		
Response to JM email	10/07/2019	0.400		
Prepare Third Party Subpoena	10/03/2019	0.600	Reduce .6 - Duplicative	
Prepare Third Party Subpoena	10/02/2019	0.700		
draft discovery Requests	10/01/2019	1.800		
Respond to request for order/set out demand	09/25/2019	0.600		
assign discovery tasks to paralegal	09/25/2019	0.200		
research drop service; alternative service	09/17/2019	0.800		
Draft motion for limited discovery	08/12/2019	1.000		
Finalize/file default (Clerk's Default/Form order)	08/05/2019	0.700		
Research default motion; D's history of defaults (att'n to "is this a strategy?")	08/02/2019	0.300		
Draft Default motion	08/02/2019	1.200		
Draft extension request	07/09/2019	0.500		
Discuss MLA with NDIL counsel (.3); call with client (.4); Draft Complaint and file (remainder)	04/12/2019	3.800		
Total		134.900	\$375	\$50,587.500
	As reduced:	133.700	\$375	\$50,137.500
<u>Fee application time</u>				
Finalize, review for glaring errors, and file full application (e	11/26/2020	0.400		
Rudler - Finalize timesheets and insert numbers; review and	11/26/2020	0.700		

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Draft memo (TOC/TOA with digital tools)	11/26/2020	0.200		
Draft memo (BriefCatch [a digital editing tool] review)	11/26/2020	0.300		
Draft memo (editing, fill in blanks, cite check/add support where appropriate)	11/26/2020	0.300		
Draft memo (research on obstinate defendant fees)	11/26/2020	0.300		
Draft memo (att'n to reasonable fees; inserts from declaration)	11/26/2020	0.500		
Draft Green Declaration	11/26/2020	1.200		
Draft memo (att'n to veil piercing)	11/26/2020	0.800		
Draft memo (att'n to facts/case history)	11/26/2020	1.700		
Fee application drafting (att'n to reasonableness of time)	11/25/2020	1.400		
Set up and begin drafting fee application	11/25/2020	0.700		
Research/respond to Defendants' response on offers	11/18/2020	0.100		
Research/respond to Defendants' refusal to provide an offer	11/18/2020	0.100		
Research/respond to Defendants' refusal to provide an offer	11/18/2020	0.100		
Email answer JM's question	11/13/2020	0.100		
Research and respond on Defendants' objections to fee demand	11/12/2020	0.300		
Prepare fee demand	11/10/2020	1.300		
		10.500	\$375	\$3,937.500
			GRAND TOTAL	\$54,075.000